IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	**CRIM NO. 1:CR-16-**
	)	
v.	)	**(JUDGE)**
	)	
	)	
STEVEN L. BERWAGER,	)	
Defendant	)	

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE
(Production of Visual Depictions of Minors Engaging in Sexually Explicit Conduct)

From on or about February 18, 2013 up to and including January 17, 2016, in Gettysburg, Adams County, Pennsylvania, within the Middle District of Pennsylvania, the defendant,

STEVEN L. BERWAGER,

having custody and control of J.W., S.B., and K.B., minor females under the age of 12, knowingly permitted the minors to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct and that said visual depictions were produced using materials that had been mailed, shipped and transported in and affecting interstate or foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2251(b).

FORFEITURE ALLEGATION

1. The allegations contained in Count 1 of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253.

2. Pursuant to Title 18, United States Code, Section 2253, upon conviction of an offense in violation of Title 18, United States Code, Section 2251(b), the defendant STEVEN L. BERWAGER, shall forfeit to the United States of America:

   a. Any visual depiction described in Title 18, United States Code, sections 2251, 2251A, or 2252, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;

   b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense; and

c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offense.

The property to be forfeited includes, but is not limited to, the following:

a. HP Probook Laptop, serial number 2CE109HTV;

b. Toshiba Satellite Laptop, serial number 1F0B5779U;

c. Canon Powershot A640 Camera with memory card;

d. Nikon D3200 Camera with bag, charging cable, batteries, lenses and manuals;

e. Go Pro Hero 4 Camera with waterproof enclosure, charging cables, and manuals;

f. Western Digital My Passport external drive, serial number WXN1E402M468;

g. Kingston DTI512 blue and white thumb drive;

h. Various black SD memory cards:

i. 8.1 – Canon 32mb;

ii. 8.2 – Jike 4gb;

iii. 8.3 – RIdata 16gb;

iv. 8.4 – Sandisk 8gb;

v. 8.5 – Sandisk ultra 32gb;

i. Black mini camera with waterproof case;

j. Maxtor internal hard drive 200gb, serial number 140KBEXG;

k. LG H443 cell phone with black case;

l. Seagate Free Agent Go external drive, serial number 5MA9HVJH;

m. Seagate external drive, SRD0SP0, serial number NA539R4M;

n. Various thumb drives:

i. 14.1 – Sandisk 32gb-1;

ii. 14.2 – Sandisk 32gb-2; and

iii. 14.3 – Staples 1gb.

3. If any of the property described above, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b) and by Title 28, United States Code, Section 2461(c).

PETER J. SMITH
United States Attorney

WILLIAM A. BEHE
Assistant United States Attorney

DATE: 6-30-16